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ROBERT HUNTER BIDEN

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**  
18 **WESTERN DIVISION**

19 ROBERT HUNTER BIDEN, an  
20 individual,

21 Plaintiff,

22 vs.

23 PATRICK M. BYRNE, an individual,  
24 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**JOINT NOTICE OF  
CONFIRMATION OF  
DEFENDANT'S DEPOSITION  
DATES AND REQUEST TO  
MODIFY THE COURT'S  
NOVEMBER 25, 2024 ORDER**

Judge: Hon. Stephen V. Wilson

**TO THE HONORABLE COURT AND ALL PARTIES:**

**PLEASE TAKE NOTICE** that, in compliance with the Court's order on the record at the November 25, 2024 Final Pretrial Conference, the Parties have agreed to conduct Defendant Patrick M. Byrne's ("Defendant") deposition via videoconferencing on Friday December 13, 2024, to begin at 9:30 A.M. EST and to continue for three and a half hours of real time. Then, on December 14, 2024, the deposition will resume at 9:30 A.M. EST and will continue for an additional three and a half hours of real time. If any additional time is needed to complete the seven (7) hours of deposition testimony that Plaintiff is entitled to under Federal Rule of Civil Procedure 30, the Parties agree to complete the deposition on Sunday, December 15, 2024, commencing at 9:30 A.M. EST.

Moreover, in the Court's November 25, 2024 Order (Dkt. No. 158), the Court ordered the deposition of Defendant to occur within two weeks of the November 25 hearing date. However, on the record, the Court ordered the Parties to conduct Defendant's deposition within three weeks of the November 25 hearing date. (*See* Dkt. No. 161, at 13:22-23.) Considering the Parties' foregoing agreement to conduct Defendant's deposition on December 13 and 14 was based on the Court's oral order at the hearing of conducting the deposition in three weeks, the Parties respectfully request that the Court modify its November 25, 2024 Order to state that the deposition must occur within *three weeks* of the November 25 hearing date and request that the Court approve of the Parties' agreement with respect to Defendant's deposition, as set forth herein.

In addition, the Court previously ordered that the mediation in this case occur by December 9, 2024, but, in light of the rescheduling of the trial date and the scheduling of Defendant's deposition, the Parties request that such deadline be extended to January 31, 2025.

The Parties reserve all rights in connection with the deposition.

1 Dated: November 27, 2024

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1 Dated: November 27, 2024

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